

BANC OF AMERICA PRACTICE SOLUTIONS, INC.,

Plaintiff,

-against-

COLLEEN A. WATSON, DDS, PC and
COLLEEN A. WATSON, DMD individually,

Defendants.

ANSWER

LAW OFFICES OF
CAROLYN V. MINTER

Attorney(s) for Defendants

BAR BUILDING
79 Croton Avenue
OSSINING, NEW YORK 10562
(914) 762-1458

To

Service of a copy of the within is hereby admitted.

Dated:

Attorney(s) for

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BANC OF AMERICA PRACTICE
SOLUTIONS, INC.,

Plaintiff,

ANSWER

-against-

Case No. 08 CIV. 3372
Judge Conner

COLLEEN A. WATSON, DDS, PC and
COLLEEN A. WATSON, DMD
individually,

Defendants.

Defendants, COLLEEN A. WATSON, DDS, PC and COLLEEN A.
WATSON, DMD, individually, by their attorneys, Law Offices of CAROLYN V.
MINTER, as and for their Answer, respectfully allege as follows:

1. Deny knowledge or information sufficient to form a belief as
to the truth of the allegations set forth in paragraphs of the Complaint
numbered "1", "10", "15", "19", "31" and "32".

2. Deny knowledge or information sufficient to form a belief as
to the truth of the allegations set forth in paragraph of the Complaint
numbered "7", except admits have a dental practice located at 107 Bannon
Avenue, Buchanan, New York, and refer questions of law to the Court.

3. Deny the allegations contained in paragraph of the Complaint
numbered "16" and refer all questions of law to the Court.

4. Repeat and reallege each and every statement contained in
the paragraphs preceding paragraphs of the Complaint numbered "6", "14",

"23", "26" and "30", with the same force and effect as if herein fully set forth at length.

5. Deny each and every allegation set forth in paragraphs of the Complaint numbered "9", "11", "12", "17", "18", "20", "24", "25", "27", "28", "29" and "33".

WHEREFORE, defendants demand judgment dismissing the Complaint in its entirety, for, inter alia, failure to state any cause of action against the defendants; failure to obtain personal jurisdiction over the defendants and for such other and further relief as to the Court seems just and proper in the premises.

Dated: Ossining, New York
April 29, 2008



CAROLYN V. MINTER (CM-7074)
Law Offices of CAROLYN V. MINTER
Attorneys for Defendants
Office & P. O. Address
Bar Building
79 Croton Avenue
Ossining, New York 10562
(914) 762-1458
Facsimile (914) 944-0149

TO: DUANE MORRIS LLP
Attorneys for Plaintiff
Office & P. O. Address
744 Broad Street, Suite 1200
Newark, NJ 07102
JOSEPH LEMKIN, Esq.
(973) 424-2000
Facsimile (973) 424-2001

AFFIDAVIT OF SERVICE

STATE OF NEW YORK) Banc of America Practice Solutions, Inc. v.
) ss.: Colleen A. Watson, DDS, PC, et al
COUNTY OF WESTCHESTER) Case No. 08 CIV. 3372

LAURA TRAPANESE, being duly sworn, deposes and says;

I am not a party to the action, am over 18 years of age and reside at Montrose, New York.

On April 29, 2008, I served a true copy of the annexed Answer, in the following manner:

By mailing the same in a sealed envelope, DHL EXPRESS, Waybill

Number 39564060141 within the State of New York, addressed to the last known address
of the addressee(s) as indicated below:

TO: DUANE MORRIS, LLP
Attorneys for Plaintiff
Office & P.O. Address
744 Broad Street, Suite 1200
Newark, New Jersey
JOSEPH LEMKIN, Esq.
(973) 424-2000
Facsimile (973) 424-2001


LAURA TRAPANESE

Sworn to before me this
29th day of April 2008


Notary Public

CAROLYN V. MINTER
Notary Public, State of New York
No. 4645306
Qualified in Westchester County
Commission Expires September 30, 2009